

FILED 15 NOV 22 15:13 USDC-ORP

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA

3:22-cr-00400-HZ

v.

INDICTMENT

STEVEN DAWAYNE WILLIS,

**18 U.S.C. § 115(a)(1)(B)
18 U.S.C. § 876(c)**

Defendant.

Forfeiture Allegation(s)

THE GRAND JURY CHARGES:

COUNT 1

**(Retaliating Against a Federal Official by Threat)
(18 U.S.C. § 115(a)(1)(B))**

On or about March 17, 2022, in the District of Oregon, defendant **STEVEN DAWAYNE WILLIS** did threaten to murder an official whose killing would be a crime under Title 18, United States Code, Section 1114, that is, Victim #3, a United States District Court Judge, with intent to retaliate against Victim #3 on account of the performance of their official duties.

All in violation of Title 18, United States Code, Section 115(a)(1)(B) and (b)(4).

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Indictment

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COUNT 2
(Mailing Threatening Communications)
(18 U.S.C. § 876(c))

On or about May 10, 2022, in the District of Oregon, defendant **STEVEN DAWAYNE WILLIS** knowingly and willfully did deposit in an authorized depository for mail matter, to be sent and delivered by the Postal Service, and knowingly caused to be delivered by the Postal Service according to the directions thereon, a communication, addressed to Victims #1 and #2, Portland Police Bureau officers, and containing a threat to injure Victims #1 and #2.

All in violation of Title 18, United States Code, Section 876(c).

COUNT 3
(Retaliating Against a Federal Official by Threat)
(18 U.S.C. § 115(a)(1)(B))

On or about August 29, 2022, in the District of Oregon, defendant **STEVEN DAWAYNE WILLIS** did threaten to murder an official whose killing would be a crime under Title 18, United States Code, Section 1114, that is, Victim #3, a United States District Court Judge, with intent to retaliate against Victim #3 on account of the performance of their official duties.

All in violation of Title 18, United States Code, Section 115(a)(1)(B) and (b)(4).

COUNT 4
(Mailing Threatening Communications)
(18 U.S.C. § 876(c))

On or about October 24, 2022, in the District of Oregon, defendant **STEVEN DAWAYNE WILLIS** knowingly and willfully did deposit in an authorized depository for mail matter, to be sent and delivered by the Postal Service, and knowingly caused to be delivered by

the Postal Service according to the directions thereon, a communication, addressed to Victim #4, a Portland Police Bureau officer, and containing a threat to injure Victim #4.

All in violation of Title 18, United States Code, Section 876(c).

FORFEITURE ALLEGATION

Upon conviction of either offense alleged in Counts 1 and 3, defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C), by way of 28 U.S.C. § 2461, any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant,

- a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or,
 - e. has been commingled with other property which cannot be divided without difficulty,
- it is the intent of the United States to seek the forfeiture of any other property of the defendant, up to the value of the above-described forfeitable property, pursuant to Title 21, United States Code, Section 853(p).

Dated: November 15, 2022


A TRUE BILL.


OFFICiating FOREPERSON

Presented by:

NICHOLAS W. BROWN

United States Attorney for the Western District of Washington

A handwritten signature in dark ink, appearing to read "Marci L. Ellsworth", is written over a horizontal line.

MARCI L. ELLSWORTH

THOMAS WOODS

Assistant United States Attorneys for the Western District of Washington

Acting Under Authority Conferred by 28 U.S.C. § 515